

THE LAW OFFICE OF  
**JOSEPH DiBENEDETTO, P.C.**  
THE WOOLWORTH BUILDING  
233 BROADWAY, SUITE 2707  
NEW YORK, NEW YORK 10279  
WWW.DIBENEDETTOLAW.COM

JOSEPH DiBENEDETTO\*  
\*ADMITTED IN NY, NJ & DC

TELEPHONE: (212) 608-5858

FACSIMILE: (212) 732-5431

EDWARD S. PANZER  
MARIO J. DeROSSI  
OF COUNSEL

February 13, 2012

VIA E.C.F.

The Honorable Sandra L. Townes  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: **United States v. Michael Virtuoso**  
**Docket No. 11 CR 508 (SLT)**

Dear Judge Townes:

I am writing to request that Mr. Virtuoso's sentencing, currently scheduled for Wednesday, February 27, 2012 at 11:30 A.M. be rescheduled to any day of the week commencing Monday, March 26, 2012 or on a date and time thereafter that is convenient for the Court.

The instant adjournment request is sought for several reasons. First, defense counsel has been preparing for trial in a multi-defendant matter in the Southern District of New York. That case appears to be resolved, as pleas are scheduled for later this week.

Second, as this Court is well aware, Mr. Virtuoso is also scheduled to be sentenced in the Southern District on a separate matter. That Presentence Report (PSR) was recently filed. Defense counsel would like the opportunity to review the PSR addressing Mr. Virtuoso's Southern District matter and confirm that the information contained in both the Eastern and Southern District PSR's are accurate and consistent.

JOSEPH DiBENEDETTO, P.C.

Finally, the requested adjournment will allow defense counsel sufficient opportunity to file objections if necessary and prepare a sentencing memorandum.

I have spoken with A.U.S.A. Stephen Frank and he will consent to the instant request so long as the defense counsel does not seek a sentencing date later than March 16, 2012.

Nevertheless, in light of the aforementioned compelling reasons, it is respectfully requested that this Court adjourn Mr. Virtuoso's sentencing to any day of the week commencing Monday, March 26, 2012 or a date and time thereafter that is convenient for the Court.

Respectfully submitted,



Joseph DiBenedetto

cc: Mr. Stephen Frank,  
Assistant United States Attorney  
(Via E.C.F.)